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MEMO ENDORSED

August 25, 2022

## **BY ECF**

The Honorable Lewis A. Kaplan United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, New York, NY 10007-1312

LEWIS A. KAPLAN, USDJ

Re: United States v. Abdel-Wadood, 19 Cr. 233 (LAK)-2

Dear Judge Kaplan:

We write, with consent of the government, to request permission for Mr. Abdel-Wadood to travel to the United Kingdom from September 1, 2022 to September 8, 2022, and to Spain from September 8, 2022 to September 15, 2022.

The purpose of Mr. Abdel-Wadood's proposed travel is for business and to spend time with family and friends. In Spain, Mr. Abdel-Wadood would join his wife and would stay with friends, including Nassef Sawiris, the younger brother of Naguib Sawiris. Naguib Sawiris was Mr. Abdel-Wadood's boss for the first ten years of his professional career and came to Mr. Abdel-Wadood's assistance after his arrest by helping him obtain a lawyer and co-signing his bail bond. Naguib Sawiris has also supported Mr. Abdel-Wadood's family while Mr. Abdel-Wadood has been in New York.

To travel, Mr. Abdel-Wadood would require both his Maltese and Egyptian passports, the former to enter Europe and the latter to re-enter the United States. We have corresponded with Mr. Abdel-Wadood's Pretrial Services Officer, P.O. Stephen Boose. As is its policy, Pretrial Services takes no position on international travel. If this request were approved, Mr. Abdel-Wadood would provide airline tickets to Pretrial Services, showing his departure and return and would provide addresses in the United Kingdom and Spain, as well as any other necessary information. He would obtain his passports the day before traveling (August 31, 2022) and return them to Pretrial Services promptly on his return. The Court previously granted Mr. Abdel-Wadood's request to travel to Italy for a wedding in May 2022, *see* ECF No. 84, and to the United Kingdom for business in June 2022, *see* ECF No. 86, under the same conditions.